

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

APR 27 2022

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. )  
DOUGLAS SIMPSON, )  
Defendant. )

4:22CR229 JAR/JMB

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. The Defendant is charged with Conspiracy to Distribute More Than 40 grams of Fentanyl, in violation of 21 U.S.C. § 846 and 841(a) and Possession with Intent to Distribute Fentanyl, in violation of Title 21, U.S.C. § 841(a). Offenses charged pursuant to 21 U.S.C. § 841(a) and 846 carry a maximum twenty years imprisonment as prescribed under Title 21. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant as required and the safety of any other person and the community.

2. An investigation initiated by the St. Louis Metropolitan Police Department with assistance from the Bureau of Alcohol, Tobacco, Firearms and Explosives revealed that the

Defendant, together with the co-defendants and others known and unknown, conspired to distribute and did, in fact, distribute, fentanyl throughout the Saint Louis area. This Defendant and co-defendant Jeffrey Moore were found in possession of over 700 capsules of fentanyl when law enforcement executed a search warrant at a residence that was being used to distribute fentanyl.

3. The Defendant's criminal history reflects that he has multiple felony convictions including, but not limited to, the following:

- 2107R-01338, *State of Missouri v. Douglas Simpson*  
Guilty Plea/Sentence Date: April 30, 2008/October 17, 2008  
Count One: Tampering First Degree  
Sentence: 1 year incarceration (following probation revocation)
- 07SL-CR04927, *State of Missouri v. Douglas Simpson*  
Guilty Plea/Sentence Date: April 30, 2008/October 17, 2008  
Count One: Burglary Second Degree  
Sentence: 1 year incarceration (following probation revocation)
- 1422-CR00235, *State of Missouri v. Douglas Simpson*  
Guilty Plea/Sentence Date: September 5, 2014  
Count One: Escape  
Count Two: Assault Third Degree on a Law Enforcement Officer  
Count Three: Assault Third Degree on a Law Enforcement Officer  
Sentence: 4 year SES, 5 years probation
- 4:15-CR-459 HEA, *United States v. Douglas Simpson*  
Guilty Plea/Sentence Date: January 7, 2016/April 6, 2016  
Count One: Felon in Possession of a Firearm  
Sentence: 49 months, 2 years supervised release

4. The Defendant completed his supervised release in July of 2021. The Defendant currently has a pending case in St. Louis County for being a felon in possession of a firearm, Case No. 21SL-CR05381.

5. There is a serious risk that the Defendant will flee, given the Defendant's failure to

comply with supervision while on supervision and his attempted flight in this case.

6. Further, the Defendant's criminal history and the nature and circumstances of the offense charged, reflect that there is a serious danger to the community that would be posed by the defendant's release.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

*/s/ Jennifer Szczucinski*  
JENNIFER SZCZUCINSKI, #56906MO  
Assistant United States Attorney